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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 5, 1998

EXPARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: CC Docket No. 96-128 - In the Matter of Implementation of the Pay
Telephone Reclassification and Compensation Provisions of the
Telecommunications Act of 1996; CC Docket No. 91-35 - In the Matter of
Policies and Rules concerning Operator Service Access and Pay Telephone
Compensation

Dear Ms. Salas:

Please enter into the record of the above dockets the attached letter to Rose Crellin
of the Enforcement Division of the Common Carrier Bureau.

In accordance with 47 C.F.R. 1.1206(a)(1) of the Commission's rules, the original
of this letter and one copy are being filed with your office. Acknowledgment and
date of receipt are requested. A duplicate of this letter is included for this purpose.

Please direct any inquiries concerning the foregoing to the undersigned.

Very truly yours,

Chris Jines

Attachment

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March 5, 1998



Ms. Rose Crellin
Enforcement Division, Common Carrier Bureau
Federal Communications Commission
2025 M Street, 6th floor
Washington, D.C. 20554

Dear Ms. Crellin:

RE: Flex ANI Waiver Requests -- CC Docket No. 96-128 -- Pay Telephone
Reclassification and Compensation Provisions of the Telecommunications Act of
1996

On January 23, 1998, Southwestern Bell Telephone Company ("SWBT"), Pacific Bell, and Nevada Bell provided an updated status on specific technological problems for which we previously had requested waivers of the Commission's requirements to provide payphone-specific digits to carriers. The purpose of this letter is to provide additional information that we have recently obtained, adding two new problems, but improving our prognosis on two others.

First, during the course of testing, we recently discovered a problem with passing Flex ANI on our Ericsson ("AXE") 10 switches with indirect trunking from tandem offices. We describe the problem below. Second, as other LECs have recently described, tests have revealed that when 800 number look-ups are done at the tandem switch level, the tandem switch is unable to selectively send Flex ANI or regular ANI codes, but instead sends all Flex ANI or none. This is not a significant problem for SWBT and Pacific Bell because almost all of their end offices have SS7 capability and

can perform the 800 number look-ups.¹ Third, for the previously identified problem concerning 800 or 888 calls routing to CICs on NORTEL switches, based on further review, we are lowering our estimate of percent of payphone calls affected from "may be up to 12%" to "7 to 9%." Fourth, we are shortening our waiver request for this NORTEL switch 800/888 CIC problem from October 15, 1999 to September 15, 1998. Fifth, we are shortening our waiver request for the problem concerning SWBT's and Pacific Bell's 0- transfer calls from DMS 200 and DMS 100/200 switches from October 15, 1999 to December 15, 1998, and will resolve the problem earlier if the vendor is able to meet its current commitments.

¹ We are unable to estimate the effect on payphone lines in independent LECs' switches for which SWBT or Pacific Bell provides SS7 tandem functions. This 800-tandem problem is more significant for Nevada Bell because it has more offices in rural areas that do not have SS7 capability or that home off of independent LEC tandems. Because of Nevada Bell's smaller size, however, the problem only affects approximately 20 of Nevada Bell's offices.

The following summarizes our current need for waivers for specific technological problems:

<u>Problem</u>	<u>Company</u>	<u>% of Payphone Calls Affected²</u>	<u>Waiver Requested Until³</u>
1. 0- transfer calls from DMS 200 and DMS 100/200	SWBT PB	< 1%	12/15/98
2. Feature Group B 950 calls (tandem and end office)	SWBT PB, NB	< ¼ %	1) no waiver due to adequate alternatives, 2) until 6 months after standard developed, or 3) five years
3. 800 or 888 calls routing to a) POTS phone numbers	a) SWBT PB NB	a) < 1%	a) until 6 months after standard developed, or five years
b) CICs on FGD and/or GR-394 signaling on DMS switches	b) SWBT PB NB	b) 7% to 9%	b) 9/15/98
4. Calls received over EAOSS trunk groups from DMS end offices	SWBT	< ½ %	8/15/98
5. AXE10 with indirect trunking	SWBT	< 2 %	7/15/98
6. 800 calls at the tandem switch	SWBT PB NB ⁴	< 1/10%	until 6 months after standard developed, or 5 years

² These are rough estimates because actual numbers are not available.

³ If we can implement Flex ANI earlier, we intend to do so.

⁴ As discussed above in this letter, the problem is more significant for Nevada Bell, but Nevada Bell provides far fewer payphone lines than SWBT or Pacific Bell.

For the newly discovered problem concerning AXE10 switches with indirect trunking, we describe the problem, the size of the problem, and the duration of the problem below.

AXE10 WITH INDIRECT TRUNKING

a) **The Problem**: The problem occurs with AXE10 switches in end offices when carriers interconnect at the tandem and indirectly trunk to the end office. In those cases, AXE10 switches do not provide the ability to selectively provide or not provide Flex ANI depending on carrier wishes and capabilities to accept Flex ANI. That is, the provision of Flex ANI is all or none.

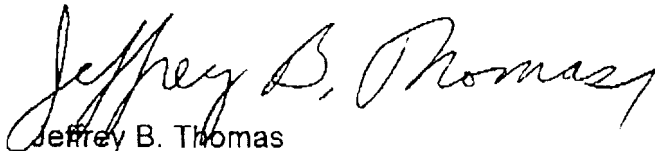
b) **The Size Of The Problem**: Most of SWBT's AXE10 switches are trunked from tandems and create this problem. SWBT has only 63 AXE10 switches, however, and there are less than 2,900 payphone lines on SWBT's AXE10 switches, which is less than 2% of its payphone lines. In addition, we estimate that only two or three of SWBT's AXE10 switches are in metropolitan areas; most are in less populated areas.

c) **The Duration Of The Problem**: We contacted Ericsson about this problem, and Ericsson has been working on, and may have, a solution. We are testing Ericsson's proposal for fixing the problem, and if their proposal is the solution we will implement it, and the problem may be gone by March 16, 1998. If the proposal does not solve the problem, it is likely to take up to four months to solve it. Therefore, we are requesting a three month waiver for this problem, in addition to the waiver until April 15, 1998 that we have already requested for general Flex ANI implementation; i.e., until July 15, 1998. If the problem is solved earlier, we will implement the solution and use

only that portion of the waiver period that turns out to be needed. In the mean time, Flex ANI lists should continue to be used to identify payphone calls.

For the reasons discussed in this and prior letters and pleadings, the Commission should grant SWBT, Pacific Bell, and Nevada Bell the above-described waivers of the Flex ANI implementation requirement.

Sincerely,

A handwritten signature in cursive script that reads "Jeffrey B. Thomas".

Jeffrey B. Thomas
Senior Counsel
Southwestern Bell Telephone Company,
Pacific Bell, and Nevada Bell

CC: Craig Stroup